IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Action No. CR88-0040-A

PAUL JACKSON,

Defendant.

DEFENDANT'S MOTION TO OBTAIN PRESENTENCE REPORT

Defendant respectfully moves for an order allowing his counsel in separate litigation to obtain a copy of the presentence report relating to him that was filed in this case in 1988 (the "Presentence Report"). In support thereof, Defendant states as follows:

- 1. Defendant is currently engaged in separate litigation in which the Dechert law firm serves as his counsel.
- 2. In connection with that separate litigation, Defendant has requested that Dechert obtain a copy of the Presentence Report.
- 3. The clerk's office has informed Dechert that, because the Presentence Report was filed under seal, Dechert will need to submit an order of this Court in order to obtain a copy.

- 4. Rule 32(i)(1)(A), Fed. R. Crim. P., provides that a defendant is entitled to a copy of his own presentence report.
- 5. Attached is a signed and notarized statement by Defendant that authorizes the release of the Presentence Report to Dechert (Attachment A).
- 6. Also attached is a proposed order allowing Dechert to obtain a copy of the Presentence Report (together with a self-addressed, stamped envelope for return of a copy of the signed order) (Attachment B).

For the foregoing reasons, Defendant respectfully requests that the Court enter the proposed order.

Dated: August 11, 2017

By:

Craig G. Falls (VSB #72926)

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Attorneys for Defendant **PAUL JACKSON**

CERTIFICATE OF SERVICE

I certify that I will serve in hand on August 11, 2017 a copy of the foregoing motion on the United States Attorney's Office for the Eastern District of Virginia.

CRAIG G. FA

August 11, 2017

Attorney for Defendant

PAUL JACKSON

AUTHORIZATION

I, Paul Eccleston Jackson (born October 6, 1967), hereby authorize the United States

District Court for the Eastern District of Virginia to provide to my attorneys, Joseph Patrick

Archie and Sara Magen of Dechert LLP, a complete copy of the Presentence Report relating to

me that was filed in 1988 in Case No. CR88-0040-A (E.D. Va.).

08-10-2017

Paul Eccleston Jackson

Sworn and subscribed to before me this 10⁺¹⁰ day of

August_____, 2017

Notary Public

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REMY L.H. BRACEY NOTARY PUBLIC DISTRICT OF COLUMBIA My Commission Expires March 31, 2022